

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Judge William L. Campbell, Jr
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

**PLAINTIFF JOHNNY M. HUNT'S
THIRD SET OF INTERROGATORIES TO GUIDEPOST SOLUTIONS LLC**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff Johnny M. Hunt ("Plaintiff") requests that Guidepost Solutions LLC respond to the following interrogatories, separately and under oath, within thirty (30) days.

GENERAL INSTRUCTIONS AND DEFINITIONS

1. The following instructions and definitions apply to each interrogatory and are incorporated by reference into each interrogatory. The interrogatories must be read in the light of these instructions and definitions, and your answers must be responsive to the interrogatories as so defined.
2. You are to timely supplement your responses to these interrogatories.
3. If you object to any interrogatory, you shall so state and include your basis for the objection in your answer to the specific interrogatory you found objectionable. If only part of any interrogatory is objectionable, answer the interrogatory as fully as possible in addition to stating the objection, and its basis, to any remaining part.

4. Rules of Construction: (a) The singular shall include the plural, and the plural shall include the singular; (b) A masculine, feminine, or neutral pronoun shall be construed to refer to all other gender pronouns; (c) “And” and “or” shall be construed conjunctively and disjunctively so as to bring within the scope of these interrogatories any information that might otherwise be construed to be outside their scope; (d) “Any” shall be understood to include and encompass one or more and “all;” and (e) The present tense shall include the past tense, for example “are” shall include “were.”

5. Claim of Privilege. Wherever any interrogatory calls for information, for the identification of a document, a thing, or an oral communication, or for the production of a document or thing, that you claim to be privileged or immune from discovery as work product or on any other ground, Plaintiff requests that you produce within thirty (30) days of service of these interrogatories a list:

- a. Identifying each particular interrogatory to which you object, and each specific ground upon which such objection is based; and
- b. Specifying each withheld document or thing or fact, or portion thereof as follows:
its date; the general nature of the document or thing (e.g., whether it is a letter, chart, pamphlet, memorandum, etc.); a summary of the contents or the general subject matter of the document or thing; the identity of each other document or other thing transmitted with or attached to that allegedly privileged or discovery-immune document or thing; its present location and the identity of its current custodian; the identity of each person who authored, prepared, or signed the document or thing; a list identifying each person, including but not limited to addressees and designated copy recipients, to whom either the original or a copy of

the document or thing has been disclosed, including the date and means of such disclosure; and the nature of the privilege, immunity, or other rule of law relied upon to withhold the information, document, or thing, and the facts supporting your asserted reliance.

Any purportedly privileged or discovery-immune information or document that contains matter that is not privileged or immune from discovery must be produced with the purportedly privileged or discovery-immune portion excised.

6. Scope of Answers. In answering these interrogatories, you are requested to furnish all information available to you, however obtained, including hearsay, information known by you or in your possession or appearing in your records, information in the possession of your attorneys, agents, accounts, employees, your investigators, and all persons acting on your behalf, and not merely the information known of your own personal knowledge. Any person who produces information in answer to the following interrogatories is requested to identify which answers he has produced and furnish his name, address, and title.

7. Qualification of Answers. If your answer is in any way qualified, please state the exact nature and extent of the qualification.

8. “Communication” or “communicate” or “communicated” means or includes every manner of transmitting or receiving information (in the form of facts, ideas, inquiries, or otherwise), and includes both oral and written communications of any type or form (including typewritten or handwritten documents, teletype, wire, e-mail, internet, digital, and any other electronic communications).

9. “Describe” means to state all information known about a particular subject, however and whenever obtained, subject to any Claim of Privilege, and includes the source of any

information. With respect to conversations or communications, “describe” further means to state the date of the conversation or communication; the time of the conversation or communication; the location(s) where the conversation or communication took place; the subject matter of the conversation or communication, including a recitation of exactly what was said and by whom; the identity of all persons who participated in the conversation or communication; and the identity of all other persons who were present during the conversation or communication.

10. “Document” or “documents” is used in a comprehensive sense as set forth in Rule 34(a) of the Federal Rules of Civil Procedure and includes, but is not limited to: any and all written, typewritten, printed, photographed, recorded, transcribed, punched, taped, filed, digital, electronic, or graphic matter of any kind or nature, however produced or reproduced, including the complete original or, where no original is available, a complete copy of the original, and each non-identical copy of the original (e.g., where different because of notes made on the copy); any form of collected data for use with electronic data processing equipment, and any mechanical, visual, or sound recordings in your custody, possession, or control and any correspondence, emails, instant messages, text messages, telegrams, telegraphs, teletypes, memoranda, agendas, contracts, studies, statements, notes, reports, agreements, diaries, statistics, letters, date books, work papers, statements, tapes, discs, minutes, entries, books of account, inter-office and intraoffice communications, notations of any sort of conversation, and lists. The term also includes all information stored in a computer system although not yet printed, all information stored on computer disks or hard drives, all information stored on computer tape backups, and all information stored on CD-ROM or electronic media, including voicemail, e-mail, text messages, or instant messages. In addition, the term “documents” means any metadata or other electronic information related to the foregoing enumerated items.

11. For all documents as defined above of which you are aware are responsive to the following interrogatories but are not produced, you should “identify” such documents. This specifically includes documents that are allegedly lost, stolen, misplaced, discarded, shredded, deleted or are not otherwise being produced for any reason.

12. “Identify,” “identity,” or “identities,”

- a. when used in reference to any entity or person means to state his/her/its name, address or a description of his/her/its location, and telephone number and, if known, date and place of birth and social security number;
- b. when used in reference to a document, means to state its form (written, typed, printed, computer printout, or other form), number of pages, author, recipient, date, and the name, current address, and job title or job description of each person presently having custody of or access to a copy of the document; and
- c. when used in reference to an event, means to state when the event occurred, who was present, and all other facts related to it.

13. “Person” includes all natural persons, corporations, limited liability companies, proprietorships, partnerships, other business associations, firms, joint ventures, public authorities, municipal corporations, state governments, local governments, governmental bodies, and any other legal entities, and the employees or agents of these entities.

14. “Concerning,” “reflecting,” “regarding,” “relating to” or “referring to” means directly or indirectly relating to, referring to, reflecting, pertaining to, describing, evidencing, supporting, constituting, comprising, containing, setting forth, showing, disclosing, defining, discussing, embodying, identifying, stating, dealing with, associated with, describing, explaining, summarizing, mentioning, including, or refuting.

15. All capitalized terms not otherwise defined shall have the meaning provided in the referenced document. Any defined term that is inadvertently not capitalized shall retain the definition provided herein.

16. If you contend that you cannot comply with any request in full, you should comply to the extent possible and provide an explanation as to why full compliance is not possible.

17. For document requests: If any portion of a document is responsive to any request, the entire document must be produced; and you must produce all documents described or requested whether they are drafts, outlines, final versions, or otherwise and/or whether they are or are not identical to any copy or copies thereof, by reason of alterations, notes, comments, initials, underscoring, indication of routing, or other material contained thereon or attached thereto. All such non-identical copies are to be produced separately. In so doing, please furnish documents that are in the possession of your directors, officers, employees, attorneys, accountants, representatives or agents, or that are otherwise subject to your custody or control.

SPECIFIC INSTRUCTIONS AND DEFINITIONS

18. “Guidepost,” “you,” and “your” refers to Guidepost Solutions LLC and its respective successors or predecessors in interest, parents, subsidiaries, divisions, affiliates, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

19. “Johnny Hunt” refers to Plaintiff Johnny M. Hunt.

20. “Complaint” refers to the Complaint in this matter and any subsequent amendments.

21. “Report” refers to the “Report of the Independent Investigation, The Southern Baptist Convention Executive Committee’s Response to Sexual Abuse Allegations and an Audit of the Procedures and Actions of the Credentials Committee” and any versions or drafts of the same.

22. “Complainant” refers to the woman mentioned in the Report who made allegations against Plaintiff.

23. “SBC” means Defendant Southern Baptist Convention and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

24. “Executive Committee” means Defendant Executive Committee of the Southern Baptist Convention and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

25. “Task Force” means the SBC Task Force as defined in the Complaint and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

26. “Cooperation Committee” means the Committee on Cooperation of the Executive Committee as defined in the Complaint and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors,

consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

INTERROGATORIES

INTERROGATORY NO. 9. For each version of the Report that you produce in this litigation, identify the date(s) that the version was created, the date(s) that it was modified (if applicable), and who, if anyone, that version was shared with. This request includes, but is not limited to, the following documents: GP_000013-GP_000300; GP_000449-GP_000736; GP_000737-GP_001021; GP_001033-GP_001324; GP_001325-GP_001612; GP_001613-GP_001900; GP_001901-GP_002188; GP_002477-GP_002764; GP_002765-GP_003050; GP_003051-GP_003338; GP_003339-GP_003625; GP_003634-GP_003921.

INTERROGATORY NO. 10. For each draft of any section of the Report relating to Plaintiff that you produce in this litigation, identify the date(s) that such document was created, the date(s) that it was modified (if applicable), and who, if anyone, that draft was shared with. This request includes, but is not limited to, the following documents: GP_000338-GP_000349; GP_000350-GP_000362; GP_000363-GP_000374; GP_000377-GP_000388; GP_000389-GP_000400; GP_000410-GP_000412; GP_001025-GP_001032; GP_002189-GP_002476; GP_003939-GP_003941; GP_004061-GP_004063.

INTERROGATORY NO. 11. Identify by bates number all versions of the Report sent to the Cooperation Committee prior to May 22, 2022.

INTERROGATORY NO. 12. Identify by bates number all versions of the Report sent to the Task Force prior to May 22, 2022.

INTERROGATORY NO. 13. State the total amount of money you billed for your work on the Report and the total amount of money you were paid for that work.

INTERROGATORY NO. 14. Did anyone from the SBC, the Executive Committee, the Task Force, the Cooperation Committee, or any other third party (i.e., someone unaffiliated with Guidepost) provide comments, suggestions or other feedback on any draft of the Report prior to May 22, 2022? If so, identify who; the date of such comments, suggestions, or feedback; the manner in which such comments, suggestions, or other feedback was provided; and the substance of such comments, suggestions or other feedback.

INTERROGATORY NO. 15. Identify and describe all documents or other materials relating to the allegations against Plaintiff in the Report that you requested from Complainant, her husband, Roy Blankenship, or any other person and state whether or not such materials were provided to you.

INTERROGATORY NO. 16. Identify each document cited in a footnote in the section of the Report relating to Johnny Hunt by (1) bates number and (2) the footnote number used in the final Report.

INTERROGATORY NO. 17. Identify all persons or entities unaffiliated with Guidepost who was provided a copy of any version of the Report or draft section of the Report prior to May 22, 2022, and the date such copy or draft section was provided to such person or entity. This request includes, but is not limited to, any copy or draft section provided to (a) the Cooperation Committee, (b) the Task Force, (c) the SBC, and/or (d) the Executive Committee.

Dated: December 1, 2023

/s/ Patrick J. Sanders

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on December 1, 2023, on the following counsel via email only:

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